

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: KERRY ALLEN & PATRICIA AGNES BATES) Chapter 13
)
)
)
)
- Creditor) No. 10B56882
JPMorgan Chase Bank, National)
Association, successor by merger to)
Chase Home Finance LLC)
)
v.) Judge
) Bruce W. Black
KERRY ALLEN & PATRICIA AGNES BATES)
- Debtor)
)

NOTICE OF MOTION

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON December 21, 2012 at 10:00 A.M., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Bruce W. Black, U.S. Bankruptcy Judge, 150 West Jefferson Street, 2nd Fl, Joliet, Illinois and shall then and there present the attached Motion, at which time you may appear if you so desire.

CERTIFICATION

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by Electronic Notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on December 12, 2012, with proper postage prepaid.

**THIS DOCUMENT IS AN ATTEMPT
TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL BE
USED FOR THAT PURPOSE**

Pierce & Associates, P.C.

/s/Yanick Polycarpe
ARDC#6237892

1 North Dearborn
Suite 1300
Chicago, Illinois 60602
(312) 346-9088

PA10-8067

NOTICE OF MOTION ADDRESSES

To Trustee:

Glenn B. Stearns
801 Warrenville Rd
Suite 650

Lisle, Illinois 60532

By Electronic Notice through ECF

To Debtor:

KERRY ALLEN & PATRICIA AGNES BATES
228 Prairie Ridge Drive
Minooka, IL 60447

By US Mail

To Attorney:

Peter Francis Geraci
55 East Monroe Street, Suite 3400
Chicago, Illinois 60603

By Electronic Notice through ECF

PIERCE & ASSOCIATES, P.C.

Attorneys For: Creditor

1 North Dearborn
Suite 1300

Chicago, Illinois 60602
(312) 346-9088

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: KERRY ALLEN & PATRICIA AGNES BATES,)
)
JPMorgan Chase Bank, National Association,)
successor by merger to Chase Home Finance LLC))
Creditor,)
) CASE NO. 10B56882
vs.) JUDGE Bruce W. Black
)
KERRY ALLEN & PATRICIA AGNES BATES,)
Debtor(s))
)

MOTION TO ALLOW LOAN MODIFICATION AGREEMENT

Nome Comes JPMorgan Chase Bank, National Association, successor by merger to Chase Home Finance LLC, a creditor herein, by and through its attorneys, Pierce and Associates, P.C. and moves this Court for entry of an Order Allowing Loan Modification, and in support thereof respectfully states as follows:

1. On December 27, 2010, the instant case was filed.
2. On February 18, 2011, the instant case was confirmed.
3. JPMorgan Chase Bank, National Association, successor by merger to Chase Home Fiance LLC services the first mortgage lien on the property commonly known as 228 Prairie Ridge Drive, Minooka, IL 60447.
4. The debtor has requested and has been approved for a loan modification by JPMorgan Chase Bank, National Association, successor by merger to Chase Home Finance LLC.

5. Among the changes, the loan modification will defer \$57,582.23 of the principal balance and shall not accrue interest on the deferred principal.
6. The interest rate pursuant to the loan modification will be reduced from 5.875% to 4.625%.
7. The principal and interest portion of debtors' monthly payment will be reduced from \$1257 to \$614.86.

WHEREFORE, YOUR MOVANT prays that this Court enter an Order allowing loan modification of the Debtor's loan with Movant as described herein, and for such other and further relief as this Honorable Court may deem just and proper.

JPMorgan Chase Bank, National
Association, successor by merger
to Chase Home Finance LLC

/s/Yanick Polycarpe
Yanick Polycarpe
ARDC#6237892

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